

EXHIBIT 3

RE: Sonos v. Google - Google's Preliminary Claim Constructions

Marc Kaplan <marckaplan@quinnemanuel.com>

Wed 4/21/2021 6:08 PM

To: mark waltfairpllc.com <mark@waltfairpllc.com>

Cc: Sonos-WDTX0881-service <Sonos-WDTX0881-service@orrick.com>; Paige Amstutz <pamstutz@scottdoug.com>; QE-Sonos3 <qe-sonos3@quinnemanuel.com>

Counsel,

For the avoidance of doubt regarding the terms that Google is currently proposing for construction, Google provides the revised disclosure below. This revised disclosure is consistent with Google's position in the joint letter to the Court yesterday as well as the Court's order this morning. Further, Google states that it expects the parties to brief the disputed terms in the default order provided for in the OGP.

| | | |
|---|-------------------------------------|---|
| "Zone" | '206 Pat. '966 Pat. '885 Pat. | an area or areas with one or more playback devices |
| "zone scene" | '206 Pat. '966 Pat. '885 Pat. | a group of two or more zones that are grouped according to a common theme by configuring the zones in a particular scene (e.g., morning, afternoon or garden) |
| "group configuration" | '206 Pat. | Indefinite |
| "an instruction for the at least one given playback device to take over responsibility for playback of the remote playback queue from the computing device, wherein the instruction configures the at least one given playback device to" | '033 Pat. | "an instruction for the at least one give playback device...": Instruction means one instruction. |
| "wherein the instruction comprises an instruction" | '615 Pat. '033 Pat. | Indefinite. |
| "remote playback queue" | | Remote playback queue provided by a third party application |
| "cloud" | '615 Pat. '033 Pat. | Over a network |
| "zone configuration" | '206 Pat. | Indefinite |

| | | |
|--|-------------------------------------|---------------------------------------|
| “causing the selectable indication of the at least one of the one or more zone scenes to be displayed” | ‘206 Pat. | Indefinite (lack of antecedent basis) |
| “invoke” | ‘206 Pat. ‘966 Pat. ‘885 Pat. | Applying a parameter or setting |

Thank you,
Marc

From: Marc Kaplan
Sent: Monday, April 19, 2021 4:59 PM
To: mark.waltfairpllc.com <mark@waltfairpllc.com>
Cc: Sonos-WDTX0881-service <Sonos-WDTX0881-service@orrick.com>; Paige Amstutz <pamstutz@scotttdoug.com>; QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: RE: Sonos v. Google - Google's Preliminary Claim Constructions

Counsel,

Please find below a further revised list of claim terms/constructions. We propose that this list plus your previously circulated list from April 14, 2021, will be the joint list of terms for the Court to construe and further that both sides agree that neither side proposed more than ten terms for construction.

| | | |
|---|-------------------------------------|---|
| “zone scene” | ‘206 Pat. ‘966 Pat. ‘885 Pat. | zone: an area or areas with one or more playback devices zone scene: a group of two or more zones that are grouped according to a common theme by configuring the zones in a particular scene (e.g., morning, afternoon or garden) |
| “group configuration” | ‘206 Pat. | Indefinite |
| “an instruction for the at least one given playback device to take over responsibility for playback of the remote playback queue from the computing device, wherein the instruction configures the at least one given playback device to” “wherein the instruction comprises an instruction” | ‘615 Pat. ‘033 Pat. | “an instruction for the at least one give playback device...”: Instruction means one instruction. “wherein the instruction comprises an instruction”: Indefinite. |

| | | |
|--|-------------------------------------|---|
| “remote playback queue” | | Remote playback queue provided by a third party application |
| “cloud” | ‘615 Pat. ‘033 Pat. | Over a network |
| “zone configuration” | ‘206 Pat. | Indefinite |
| “causing the selectable indication of the at least one of the one or more zone scenes to be displayed” | ‘206 Pat. | Indefinite (lack of antecedent basis) |
| “invoke” | ‘206 Pat. ‘966 Pat. ‘885 Pat. | Applying a parameter or setting |
| “configure” | ‘033 Pat. | Set parameters for |
| “data defining the second zone scene” | ‘966 Pat. | Indefinite |

Thank you,
Marc

From: Marc Kaplan
Sent: Friday, April 16, 2021 11:16 PM
To: mark waltfairpllc.com <mark@waltfairpllc.com>
Cc: Sonos-WDTX0881-service <Sonos-WDTX0881-service@orrick.com>; Paige Amstutz <pamstutz@scottdoug.com>; QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: RE: Sonos v. Google - Google's Preliminary Claim Constructions

Counsel,

I have attached Google's revised disclosure of its claim constructions.

Thank you,
Marc

From: Marc Kaplan
Sent: Friday, April 2, 2021 10:54 PM
To: mark waltfairpllc.com <mark@waltfairpllc.com>
Cc: Sonos-WDTX0881-service <Sonos-WDTX0881-service@orrick.com>; Paige Amstutz <pamstutz@scottdoug.com>; QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: Sonos v. Google - Google's Preliminary Claim Constructions

Counsel,

Please see the attached preliminary proposed claim constructions.

Thank you,
Marc

Marc L. Kaplan | Quinn Emanuel Urquhart & Sullivan, LLP | Direct: 312.705.7450